

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT GREENEVILLE**

**B.P., H.A., and S.H., individually, and
on behalf of all others similarly situated,**

Plaintiffs,

vs.

**CITY OF JOHNSON CITY, TENNESSEE,
a governmental entity,**

**KARL TURNER, individually and in his
official capacity as Chief of the Johnson
City Police Department,**

**KEVIN PETERS, individually and in his
official capacity as Captain of the
Johnson City Police Department,**

**TOMA SPARKS, individually and in his
official capacity as Investigator of the
Johnson City Police Department,**

**JUSTIN JENKINS, individually and in his
official capacity as Investigator of the
Johnson City Police Department,**

**JEFF LEGAULT, individually and in his
official capacity as Investigator of the
Johnson City Police Department,**

**BRADY HIGGINS, individually and in his
official capacity as Investigator of the
Johnson City Police Department, and**

DOES 8-20, inclusive,

Defendants.

No. 2:23-cv-71

Judge McDonough

Magistrate Judge McCook

JURY TRIAL DEMAND



**INVESTIGATOR TOMA SPARKS' RESPONSES TO PLAINTIFFS' SECOND
SET OF INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS**

■ [REDACTED]
[REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]

3. Identify all YOUR sources of income since January 1, 2018, including the annual amount of each source as reported on tax returns.

RESPONSE: Objection. This request is not reasonably calculated to lead to the discovery of relevant information and is overly broad and unduly burdensome. Without waiving said objection, Defendant Sparks identifies the following sources of employment income from his wife and himself. **ATTORNEY-EYES ONLY DESIGNATION** as to employment income information disclosed relating to Defendant Sparks' wife, C. Sparks.

T. Sparks-City of Johnson City	C. Sparks-[REDACTED]
2018 \$41,040.09	[REDACTED]
2019 \$44,581.08	[REDACTED]
2020 \$45,993.36	[REDACTED]
2021 \$47,898.95	[REDACTED]
2022 \$55,878.23	[REDACTED]
2023 \$60,323.04	[REDACTED]

4. Identify all accounting firms used to prepare YOUR tax returns since January 1, 2018, including the name and address of each firm.

RESPONSE: None

VERIFICATION

Pursuant to Fed. R. Civ. P. 33(b)(3) and (5), the undersigned, Toma Sparks, makes oath that the foregoing responses to interrogatories are true and correct to the best of his knowledge and belief. I declare under penalty of perjury that the foregoing is true and correct pursuant to 28 U.S.C. § 1746.

Executed on April 24, 2024.


TOMA SPARKS

Respectfully submitted,

/s/Kristin E. Berexa

Kristin E. Berexa, BPR# 14833

Benjamin C. Allen, BPR #35923

FARRAR | BATES | BEREXA

12 Cadillac Drive, Suite 480

Brentwood, Tennessee 37027

(615) 254-3060

kberexa@fbb.law

ballen@fbb.law

*Counsel for Toma Sparks in his individual
capacity*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this the 25th day of April, 2024, a true and correct copy of the foregoing has been forwarded via Email and/ or US Mail:

Heather Moore Collins
Ashley Walter
HMC Civil Rights Law, PLLC
7000 Executive Center Dr.
Suite 320
Brentwood, TN 37027
615-724-1996
Email: heather@hmcivilrights.com
ashley@hmcivilrights.com
Attorneys for Plaintiffs

Vanessa Baehr-Jones
Advocates for Survivors of Abuse
4200 Park Blvd., No. 413
Oakland, CA 94602
Email:
vanessa@advocatesforsurvivors.com
Pro Hac Vice Attorney for Plaintiffs

Kevin Osborne
Elizabeth Kramer
Erickson Kramer Osborne LLP
44 Tehama St.
San Francisco, CA 94105
Email: kevin@eko.law
Email: elizabeth@eko.law
Pro Hac Vice Attorneys for Plaintiffs

Thomas J. Garland, Jr.
Milligan & Coleman, PLLP
230 W Depot St.
Greeneville, TN 37743
Email: tgarland@milligancoleman.com
Attorney for the City of Johnson City, Tennessee, and Karl Turner, in his individual capacity

Emily C. Taylor
Watson Roach Batson & Lauderback
P.O. Box 131
Knoxville, TN 37901-0131
(865) 637-1700
Email: etaylor@watsonroach.com
Attorney for the City of Johnson City, Tennessee, and Karl Turner, in his Individual Capacity

K. Erickson Herrin
Herrin McPeak & Associates
515 E. Unaka Avenue
P.O. Box 629
Johnson City, TN 37605-0629
(423) 929-7113
Email: lisa@hbm-lawfirm.com
Attorney for the City of Johnson City, Tennessee, Karl Turner, in his individual and official capacities, Toma Sparks, in his official capacity, and Kevin Peters, in his official capacity

Daniel H. Rader IV
André S. Greppin
Moore, Rader, Fitzpatrick and York, P.C.
46 N. Jefferson Avenue
Cookeville, TN 38501
(931) 526-3311
Email: danny@moorerader.com
Email: andre@moorerader.com
Attorney for Kevin Peters

Reid A. Spaulding
Watson, Roach, Batson & Lauderback, PLC
P O Box 131
Knoxville, TN 37901
Email: rspaulding@watsonroach.com
Attorney for Johnson City, Karl Turner, in his individual and official capacities, Captain Kevin Peters, in his official capacity, Investigator Toma Sparks, in his official capacity and Justin Jenkins in his official capacity.

Keith H. Gant
Laura Beth Rufolo
Philip Aaron Wells
Robinson, Smith & Wells, PLLC
Suite 700, Republic Centre
633 Chestnut Street
Chattanooga, TN 37450
(423) 756-5051
*Attorneys for Justin Jenkin, Jeff
Legault, and Brady Higgins*

Jonathan P. Lakey
Burch, Porter, & Johnson, PLLC
130 N. Court Ave.
Memphis, TN 38103
P: (901) 524-5000
E: jlakey@bpjlaw.com
Attorney for the City of Johnson City, Tennessee

/s/ Kristin E. Berexa
Kristin E. Berexa